

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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Operator: NORTH SHORE GAS CO	Operator ID#: 13660
Inspection Date(s): 1/30/2014, 2/10/2014, 2/11/2014, 2/13/2014 (Half)	Man Days: 3.5
Inspection Unit: Mundelein, Waukegan	
Location of Audit: Chicago	
Exit Meeting Contact: Al Weber	
Inspection Type: Standard Inspection Plan Review- O and M	
Pipeline Safety Representative(s): Steve Canestrini	
Company Representative to Receive Report: Tom Webb	
Company Representative's Email Address: TJWebb@peoplesgasdelivery.com	

Headquarters Address Information:	3001 W. Grand Avenue Waukegan, IL 60085 Emergency Phone#: Fax#:	
Official or Mayor's Name:	Willard Evans Phone#: (000) 000-0000 Email:	
Inspection Contact(s)	Title	Phone No.
Eddie Morrow	Senior Engineer	
Steve Lipka	General Supervisor	
Al Weber	Manager, Technical Training	

REPORTING PROCEDURES		Status
[192.605(b) (4)][191.5]	Does the operator's procedure require Telephonic Notices of Incidents reported to the NRC (800-424-8802)?	<b>Satisfactory</b>
<u>General Comment:</u> EOP, Section 5, page 2. DOT reporting requirements.		
[192.605(b) (4)][191.9(a)]	Does the operator's procedure require a DOT Incident Report Form 7100.1 submitted within 30 days after detection of an incident?	<b>Satisfactory</b>
<u>General Comment:</u> EOP, Section 5, page 2. DOT reporting requirements.		

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[192.605(b) (4)][191.9(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100.1)	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>EOP, Section 5, page 2. DOT reporting requirements.</i>		
[192.605(b) (4)][191.15(a)]	Does the operator's procedure require a DOT Incident Report Form 7100-2 submitted within 30 days after detection of an incident?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>EOP, Section 5, page 2. DOT reporting requirements.</i>		
[192.605(b) (4)][191.15(b)]	Does the operator's procedure require a supplemental incident report when deemed necessary? (Form F7100-2)	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>EOP, Section 5, page 2. DOT reporting requirements.</i>		
[192.605(a)][191.25]	Does the operator's procedure require filing the SRCR within 5 days of determination, but not later than 10 days after discovery?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>EOP, Section 5, page 25, Reporting Safety Related Conditions to the Federal Department of Transportation, and the Illinois Commerce Commission.</i>		
[192.605(d)][191.23]	Does the operator's procedure contain instructions to enable operation and maintenance personnel to recognize potential Safety Related Conditions?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>EOP, Section 5, page 25, Reporting Safety Related Conditions to the Federal Department of Transportation, and the Illinois Commerce Commission.</i>		
[595.120.(a)]	Reports of Accidents: Does the operator have provisions for reporting accidents or damage to the ICC? (217-782-5050)	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>EOP, Section 5, page 6, Reporting of Accidents and Incidents to the Illinois Commerce Commission.</i>		
<b>CUSTOMER NOTIFICATION AND EFV INSTALLATION PROCEDURES</b>		<b>Status</b>
[192.13(c)][192.16]	Does the operator have procedures for notifying new customers, within 90 days, of their responsibility for those sections of service not maintained by the operator?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Integrlys, Section 1550, Customer Notification, page 4, Customer Notification.</i>		
[192.13(c)][192.381]	Does the operator's procedure require that when	<b>Satisfactory</b>

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	EFVs are installed on single family residents that shall at a minimum meet the performance requirements of §192.381?	
<b>General Comment:</b> <i>Integrys Field Manual, Section 520, page 10, EFV Requirements.</i>		
<b>INSTALLATION OF TRANSMISSION &amp; DISTRIBUTION MAIN PIPE</b>		<b>Status</b>
[192.13(c)][192.319]	Does the operator's procedure contain specifications for installation of transmission line or main in a ditch?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas, Main Work Order 3.010, Guidelines for Steel Main Installation, Section 9, Excavation and Installation.</i>		
[192.13(c)][192.321]	Does the operator's procedure contain specifications for installation of plastic pipe in the ditch including a means of locating pipe?	<b>Satisfactory</b>
<b>General Comment:</b> <i>Integrys, Section 420, Main-Plastic, page 6 Trenching, page 10, Installing Tracer Wire.</i>		
[192.13(c)][192.323]	Does the operator's procedure contain casing requirements?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas, Corrosion Control Order 1.600, Casing Installation Procedure under a Highway or Railroad.  North Shore Gas, Main Work Order 2.020, Shear Protection for Plastic Mains.</i>		
[192.13(c)][192.325]	Does the operator's procedure contain underground clearance specifications?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas, Main Work Order 1.020, Main Installation Depth and Clearance Requirements.</i>		
[192.13(c)][192.327]	Does the operator's procedure specify the amount of cover required for various types of installations?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas, Main Work Order 1.020, Main Installation Depth and Clearance Requirements.</i>		
[192.13(c)][192.321(g)]	Does the operator's procedure specify the time limitations for exposure to UV rays for PE pipe?	<b>Satisfactory</b>
<b>General Comment:</b> <i>Integrys Manual 420, Main, Plastic, page 6, Weatherability and Storage.</i>		
<b>SERVICE LINE INSTALLATION</b>		<b>Status</b>
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as depth?	<b>Satisfactory</b>
<b>General Comment:</b> <i>Integrys 520, Services-Plastic, section 520.4.11, Depth of Installation.</i>		

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[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as support and backfill	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Service Pipe Order 1.000, section 10, Pipe Protection.  Integrys 520 Services-Plastic, section 520.4.12, Support and Backfill</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as protection against strain and loading	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Integrys 520 Services-Plastic, section 520.4.10, Construction Standards.  North Shore Gas, Service Pipe Work Order 1.000, section 11, External Forces on Service Pipes.</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line into a building	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Service Pipe Work Order 1.700, Procedure for installation of meters and regulators. Integrys 610 Field Manual, Single Meter Sets.</i>		
[192.13(c)][192.361]	Does the operator's procedure include service line installation standards such as installation of service line under a building	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Integrys 520 Services-Plastic, section 520.4.9, Route Selection. North Shore Gas Service Pipe Work 2.400, Service Pipe Under Building.</i>		
[192.13(c)][192.365]	Does the operator's procedure address service line valve location?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Integrys 520, Services-Plastic, section 520.4.5, Valve Standards.</i>		
[192.13(c)][192.367]	Does the operator's procedure include specifications for service line connection to the main?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Integrys 520, Services-Plastic, section 520.4.8, Service Tees / Tie-ins Standards.</i>		
CUSTOMER METERS AND REGULATORS		Status
[192.13(c)][192.353]	Does the operator's procedure contain requirements for the location of meters and regulators?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Integrys Procedure 610, section 610.4.6, Meter Set Assembly Locations</i>		
[192.13(c)][192.355]	Does the operator's procedure contain provisions to protect customer's meters and regulators from damage?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		

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<i>Integrys Procedure 610, section 610.4.6, Meter Set Assembly Locations</i>		
[192.13(c)][192.357(a)]	Does the operator's procedure require each regulator and meter to be installed so as to minimize anticipated stresses upon the connecting piping and the meter?	<b>Satisfactory</b>
<b>General Comment:</b> <i>Integrys Procedure 610, section 610.4.4, Internal Relief Valves and Vent Lines.</i>		
[192.13(c)][192.357(d)]	Does the operator's procedure require each regulator that might release gas in its operation to be vented to the outside atmosphere?	<b>Satisfactory</b>
<b>General Comment:</b> <i>Integrys Procedure 610, section 610.4.4, Internal Relief Valves and Vent Lines.</i>		
<b>NORMAL OPERATING AND MAINTENANCE PROCEDURES</b>		<b>Status</b>
[192.605(a)]	Does the operator's procedure require the O&M Plan to be reviewed and updated at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b>General Comment:</b> <i>Integrys Section 1520, Standard Review Plan. Staff is recommending this procedure be reviewed to clarify the annual review is required. In various sections, the procedure uses the word "Should", rather than "Shall".</i>		
Does the operator's procedure require the OQ Plan to be reviewed and updated in connection with the O&M Plan review at a minimum of 1 per year/15 months?		<b>Yes</b>
<b>General Comment:</b> <i>Integrys Section 1520, Standard Review Plan. Staff is recommending this procedure be reviewed to clarify the annual review is required. In various sections, the procedure uses the word "Should", rather than "Shall".</i>		
Do procedures clearly include the name of the reviewer and dates of reviews?		<b>Yes</b>
[192.605(a)][192.605(b)(3)]	Does the operator's procedure require making construction records, maps, and operating history available to appropriate operating personnel?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas EOP, Section 4, Maps and emergency valve register</i>		
[192.605(a)][192.605(b)(5)]	Does the operator's procedure contain provisions for start up and shut down of a pipeline to assure operation within MAOP plus allowable buildup?	<b>Unsatisfactory</b>
<b>NOA Comment:</b> <i>A procedure could not be located that contains provisions for start up and shutdown of a pipeline to assure operations within MAOP plus allowable buildup.</i>		
[192.605(a)][192.605(b)(8)]	Does the operator's procedure contain provisions for periodically reviewing the work done by operator's personnel to determine the effectiveness and adequacy of the procedures used in normal operation and maintenance and modifying the procedures	<b>Satisfactory</b>

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	when deficiencies are found?	
<b>General Comment:</b>		
North Shore Gas Procedure 11 QA/QC, section 1, Audit Scope.		
[192.605(a)][192.605(b)(9)]	Does the operator's procedure contain provisions taking for adequate precautions in excavated trenches to protect personnel from the hazards of unsafe accumulations of vapors or gas, and making available when needed at the excavation, emergency rescue equipment, including a breathing apparatus and a rescue harness and line? If not, then does the plan include prohibiting personnel from entering excavated trenches that may be hazardous?	<b>Satisfactory</b>
<b>General Comment:</b>		
NSG Procedure 1700, Respiratory Protection		
ABNORMAL OPERATING PROCEDURES FOR TRANSMISSION		Status
<b>Category Comment:</b>		
This was not reviewed as part of this audit. It will be reviewed with Transmission at a later date.		
[192.605(a)][192.605(c)(1)(i)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of unintended closure of valves or shut downs?	<b>Not Checked</b>
[192.605(a)][192.605(c)(1)(ii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of increase or decrease in pressure or flow rate outside of normal operating limits?	<b>Not Checked</b>
[192.605(a)][192.605(c)(1)(iii)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of loss of communications?	<b>Not Checked</b>
[192.605(a)][192.605(c)(1)(iv)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of the operation of any safety device?	<b>Not Checked</b>
[192.605(a)][192.605(c)(1)(v)]	Does the operator's procedure contain provisions for responding to, investigating, and correcting the cause of any other foreseeable malfunction of a component, deviation from normal operations or personnel error?	<b>Not Checked</b>
[192.605(a)][192.605(c)(2)]	Does the operator's procedure contain provisions for checking variations from normal operation after abnormal operations ended at sufficient critical locations?	<b>Not Checked</b>
[192.605(a)][192.605(c)(3)]	Does the operator's procedure contain provisions for notifying the responsible operating personnel when notice of an abnormal operation is received?	<b>Not Checked</b>
[192.605(a)][192.605(c)(4)]	Does the operator's procedure contain provisions for	<b>Not Checked</b>

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	periodically reviewing the response of operating personnel to determine the effectiveness of the procedures and taking corrective action where deficiencies are found?	
<b>CHANGE IN CLASS LOCATION PROCEDURES</b>		<b>Status</b>
[192.605(a)][192.609]	Does the operator's procedure contain provisions for conducting a class location survey whenever an increase in populations density indicates a change in class location or a segment of an existing steel pipeline operating at a hoop stress that is more than 40 percent of SMYS, or indicates that the hoop stress corresponding to the established MAOP for a segment of existing pipeline is not commensurate with the present class location?	<b>Unsatisfactory</b>
<p><b><u>NOA Comment:</u></b></p> <p>Staff could not identify a procedure for conducting a class location survey when an increase in population density indicates a change in class location.</p>		
[192.605(a)][192.611]	In the event a change in class location becomes necessary does the manual contain procedures for confirmation or revision of the MAOP?	<b>Not Checked</b>
<p><b><u>General Comment:</u></b></p> <p>An NOA was written on conducting a class location change for the previous question. This needs to be incorporated into the procedure above.</p>		
<b>CONTINUING SURVEILLANCE PROCEDURES</b>		<b>Status</b>
[192.613(a)]	Does the operator's procedure include requirements for continuing surveillance of facilities to determine and take appropriate action concerning class location changes, failures, leak history, corrosion, cathodic protection requirements, and other unusual operating conditions?	<b>Unsatisfactory</b>
<p><b><u>General Comment:</u></b></p> <p>An NOA was issued under the distribution records audit performed February 4th thru 7th, 2014.</p>		
[192.613(a)][192.613(b)]	Does the operator's procedure include requirements for reducing the MAOP, or other actions to be taken, if a segment of pipeline is in unsatisfactory condition?	<b>Unsatisfactory</b>
<p><b><u>NOA Comment:</u></b></p> <p>A procedure could not be located which includes requirements for reducing the MAOP or other actions to be taken, if a segment of pipeline is in unsatisfactory condition.</p>		
[192.613(a)][192.459]	Does operator have procedures for determining if exposed cast iron was examined for evidence of graphitization and, if necessary, were remedial actions taken?	<b>Not Applicable</b>
<p><b><u>General Comment:</u></b></p> <p>The operator does not have cast iron pipe in their system.</p>		

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[192.613(a)][192.489]	Does the operator's procedure include requirements for surveillance of cast iron pipelines, including appropriate action resulting from tracking circumferential cracking failures, study of leak history, or any other unusual operating maintenance conditions?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator does not have cast iron pipe in their system.</i>		
<b>DAMAGE PREVENTION PROGRAM PROCEDURES</b>		<b>Status</b>
[192.605(a)][192.614(c)(1)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-identifies persons who engage in excavating?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>NSG Order 6, Damage Prevention Program. Item 3, One Call System.</i>		
[192.605(a)][192.614(c)(2)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides notification to the public in the One Call area?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>NSG Order 6, Damage Prevention Program. Item 5, Notification of Public and Contractors.</i>		
[192.605(a)][192.614(c)(3)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides means for receiving and recording notifications of pending excavations?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>NSG Order 6, Damage Prevention Program. Item 6, Receiving and Recording Notification of Planned Excavation Activities.</i>		
[192.605(a)][192.614(c)(4)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides notification of pending excavations to the members?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>NSG Order 6, Damage Prevention Program. Item 6, Receiving and Recording Notification of Planned Excavation Activities.</i>		
[192.605(a)][192.614(c)(5)]	Does the operator's procedure require participation in a qualified one-call program, or if available, a company program that complies with the following-provides means of temporary marking for the pipeline in the vicinity of the excavations?	<b>Satisfactory</b>



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<b><u>General Comment:</u></b> NSG Order 6, Damage Prevention Program. Item 7, Temporary Marking of Underground Facilities.		
[192.605(a)][192.614(c)(6)(i)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- Inspection must be done to verify integrity of the pipeline?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> NSG Order 6, Damage Prevention Program. Item 8, Inspection of Pipelines Susceptible to Damage from Excavation Activities.		
[192.605(a)][192.614(c)(6)(ii)]	Does the operator's procedure provide for follow-up inspection of the pipeline where there is reason to believe the pipeline could be damaged- After blasting, a leak survey must be conducted as part of the inspection by the operator?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> NSG Order 6, Damage Prevention Program. Item 8, Inspection of Pipelines Susceptible to Damage from Excavation Activities.		
Has the Operator adopted the applicable Common Ground Alliance Best Practices?		<b>Yes</b>
Does the operator have adequate directional drilling/boring procedures to determine effective actions to protect their underground facilities from the dangers posed by directional drilling and other trenchless technology? A pipeline operator's damage prevention program shall include actions to protect their facilities when directional drilling operations are conducted in proximity to the pipeline. These procedures should include, but are not limited to, accurately locating underground piping and reviewing personnel qualifications?		<b>Yes</b>
[IL ADM. CO.265.100(b)]	Does the operator have procedures to report third party damage to mains, when a release of gas occurs, reported to ICC JULIE Enforcement?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> NSG Order EOP, Section 5, item 3, states to notify the ICC JULIE Enforcement only on third party damage on transmission pipeline.		
<b>EMERGENCY PROCEDURES</b>		<b>Status</b>
[192.615(a)(9)]	Does the operator have procedures for restoring service outages after the emergency has been rendered safe?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, Appendix A, Widespread interruption of Gas Supply		
[192.615(a)(1)]	Does the operator have procedures for receiving, identifying, and classifying notices of events which require immediate response by the operator?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, section 4, General.		

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[192.615(a)(2)]	Does the operator have procedures for establishing and maintaining communication with appropriate public officials regarding possible emergency?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, section 3, Liaison Procedures.		
[192.615(a)(3)(i)]	Does the operator have procedures for prompt response to gas detected inside or near a building?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, section F, Initial response procedure for emergencies confined to a customer's premise.		
[192.615(a)(3)(ii)]	Does the operator have procedures for prompt response to a fire located near a pipeline?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, appendix D, Explosion or Fire.		
[192.615(a)(3)(iii)]	Does the operator have procedures for prompt response to an explosion near a pipeline?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, appendix D, Explosion or Fire		
[192.615(a)(3)(iv)]	Does the operator have procedures for prompt response to natural disasters?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, appendix I, Natural Disasters.		
[192.615(a)(4)]	Does the operator have procedures for the availability of personnel, equipment, instruments, tools, and material required at the scene of an emergency?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, Section 2, Internal Call Procedures.		
[192.615(a)(5)]	Does the operator have procedures for actions directed towards protecting people first, then property?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, section 4, Initial response procedure.		
[192.615(a)(6)]	Does the operator have procedures for emergency shutdown or pressure reduction to minimize hazards to life or property?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, EOP, appendix F, Excessive pressure in the distribution system.		

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[192.615(a)(7)]	Does the operator have procedures to require making safe any actual or potential hazard to life or property?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas, EOP, section 4, Initial response procedure</i>		
[192.615(a)(8)]	Does the operator have procedures requiring the notification of appropriate public officials required at the emergency scene and coordinating planned and actual responses with these officials?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas, EOP, section 4, Initial response procedure</i>		
[192.615(a)(10)]	Does the operator have procedures for investigating accidents and failures as soon as possible after the emergency?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas, EOP, section 9, Failure Investigation Procedure.</i>		
[192.615(b)(1)]	Does the operator have procedures for furnishing applicable portions of the emergency plan to supervisory personnel who are responsible for emergency action?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>A copy of the emergency plan is available to supervisory personnel in electronic format and can be accessed thru their computer.</i>		
[192.615(b)(2)]	Does the operator have procedures for training appropriate employees as to the requirements of the emergency plan and verifying effectiveness of training?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas EOP, section 5, Company Response</i>		
[192.615(b)(3)]	Does the operator have procedures for reviewing employee activities to determine whether the procedures were effectively followed in each emergency?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The operator does perform a review after an emergency to determine if procedures were followed, and make recommendations for improvement.</i>		
[192.615(c)]	Does the operator have procedures to establish and maintain liaison with appropriate public officials, such that both the operator and public officials are aware of each other's resources and capabilities in dealing with gas emergencies?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		

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North Shore Gas, EOP, section 3, Liaison Procedures

Does the operator have procedures for leaks caused by excavation damage near buildings and determine whether the procedures adequately address the possibility of multiple leaks and underground migration of gas into nearby buildings?	<b>Yes</b>
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**General Comment:**

North Shore Gas Initial Response and Emergency Procedure.

FAILURE INVESTIGATION PROCEDURES		Status
[192.617]	Does the operator have procedures for analyzing accidents and failures, including laboratory analysis where appropriate, to determine cause and prevention of recurrence?	<b>Satisfactory</b>

**General Comment:**

North Shore Gas, EOP, section 9, Failure Investigation Procedure

MAOP PROCEDURES		Status
[192.605(a)][192.621]	Does the operator have procedures for establishing the MAOP for High Pressure Distribution Systems?	<b>Satisfactory</b>

**General Comment:**

North Shore Gas, Order 2.170, Pressure Testing Mains and Services.

[192.605(a)][192.623]	Does the operator have procedures for establishing the Minimum and Maximum Allowable Operating Pressure Low Pressure Distribution Systems?	<b>Not Applicable</b>
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**General Comment:**

The operator does not have any low pressure in their system.

[192.605(a)][192.619(a)(1)]	Is MAOP determined by design and test? or	<b>Unsatisfactory</b>
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**NOA Comment:**

Documentation could not be provided for a procedure of how an MAOP is determined by test or design.

[192.605(a)][192.619(a)(2)]	Does the operator have procedures requiring the MAOP to be determined by test pressure divided by applicable factor?	<b>Unsatisfactory</b>
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**NOA Comment:**

Documentation could not be provided for a procedure requiring the MAOP to be determined by test pressure divided by applicable factor.

[192.605(a)][192.619(a)(3)]	Does the operator have procedures requiring the MAOP to be determined by highest operating pressure to which the segment of line was subjected between July 1, 1965 and July 1, 1970?	<b>Unsatisfactory</b>
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**NOA Comment:**

Documentation could not be provided for a procedure requiring the MAOP to be determined by the highest operating pressure to which the segment of the line was subjected between July 1, 1965, and July 1, 1970

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

[192.605(a)][192.619(a)(4)]	Does the operator have procedures requiring the MAOP to be determined by the maximum safe pressure determined by operator?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Integritys Integrity Management, Section 11, Remediation if conditions found.</i>		
[192.605(a)][192.619(b)]	Does the operator have procedures requiring overpressure devices be installed if .619 (a) (4) is applicable?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> <i>Staff could not identify a procedure requiring overpressure devices be installed if .619(a)(4) is applicable.</i>		
<b>PRESSURE TEST PROCEDURES</b>		<b>Status</b>
[192.13(c)]	Does the plan allow for the use of pre-tested pipe for repairs?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> <i>Documentation could not be provided if the plan allows the use of pre-tested pipe for repairs.</i>		
[192.13(c)][192.503(a)(1)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until it is pressure tested in accordance with this subpart and §192.619 to substantiate the maximum allowable operating pressure; and	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.</i>		
[192.13(c)][192.503(a)(2)]	Does the operator's procedure prohibit operating a new segment of pipeline, or return to service a segment of pipeline that has been relocated or replaced, until all potentially hazardous leaks have been located and eliminated?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes</i>		
[192.13(c)][192.503(b)(1),192.503(b)(2),192.503(b)(3)]	Does the operator's procedure indicate that, for a new segment of pipeline, or a segment of pipeline that has been relocated or replaced, the pressure test medium must be liquid, air, natural gas, or inert gas that is compatible with the material of which the pipeline is constructed, relatively free of sedimentary materials, and except for natural gas, nonflammable?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes</i>		

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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[192.13(c)][192.503(d)]	Does the operator's procedure indicate that each joint used to tie in a test segment of pipeline is excepted from the specific test requirements of this subpart, but each non-welded joint must be leak tested at not less than its operating pressure?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes		
[192.13(c)][192.505(b)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more which are based on class location?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes		
[192.13(c)][192.505(c)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYS or more to be tested at or above the required test pressure for at least 8 hour?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes		
[192.13(c)][192.505(d)]	Except for service lines, Does the operator's procedure include requirements for strength testing of pipe to operate at a hoop stress of 30% of SMYSs or more for replacement components if not certified by manufacturer?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes		
[192.13(c)][192.505(e)]	Except for service lines, Does the operator's procedure include requirements for fabricated units and short sections of pipe which operates at a hoop stress of 30% or more of SMYS and for which a post installation test is impractical, that a pre-installation strength test must be conducted by maintaining the pressure for at least 4 hours?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes		
[192.13(c)][192.507]	Does the operator's procedure include requirements for testing pipelines, which operate at a hoop stress less than 30% of SMYS and at or above 100 psig?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes</i>		
[192.13(c)][192.509(b)]	Does the operator's procedure include requirements for testing steel main which operate below 100 psig at a minimum of 10 psig for main that operates below 1 psig and for each steel main to operate below 100 psig test to a minimum of 90 psig for main that operates over 1 psig?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
<i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes</i>		
[192.13(c)][192.511(b)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure as follows: 50 psig if the line operates over 40 psig?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
<i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes</i>		
[192.13(c)][192.511(c)]	Does the operator's procedure include test requirements for service lines other than plastic which specify minimum test pressure of 90 psig if the line operates over 40 psig, unless the service line is stressed to 20% or more SMYS then testing must be conducted in accordance with 192.507?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
<i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes</i>		
[192.13(c)][192.513(c)]	Does the operator's procedure include test requirements for plastic pipelines of 150% of MOP or 50 psig whichever is greater?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
<i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes</i>		
[192.13(c)][192.517(a)(1)]	Does the plan require test records for pipelines that operate over 100 psig that include: Operators name, responsible employee's name, name of testing company?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
<i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.</i>		
[192.13(c)][192.517(a)(2)]	Does the plan require test records for pipelines that operate over 100 psig that include test medium?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
<i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.</i>		
[192.13(c)][192.517(a)(3)]	Does the plan require test records for pipelines that operate over 100 psig that include test pressure?	<b>Satisfactory</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<b><u>General Comment:</u></b>		
North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.		
[192.13(c)][192.517(a)(4)]	Does the plan require test records for pipelines that operate over 100 psig that include test duration?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.		
[192.13(c)][192.517(a)(5)]	Does the plan require test records for pipelines that operate over 100 psig that include pressure recording charts of readings?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.		
[192.13(c)][192.517(a)(7)]	Does the plan require test records for pipelines that operate over 100 psig that include leaks and failures noted?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.		
<b>ODORIZATION of GAS PROCEDURES</b>		<b>Status</b>
[192.605(a)][192.625(a)]	Does the operator's procedure include a requirement that distribution lines must contain odorized gas?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
North Shore Gas Exhibit 1, General, Odorization Facilities.		
[192.605(a)][192.625(b)]	Does the operator's procedure require odorized gas in Class 3 or 4 locations (if applicable)?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
North Shore Gas Exhibit 1, General, Odorization Facilities.		
[192.605(a)][192.625(f)]	Does the operator's procedure require periodic gas sampling, using an instrument capable of determining the percentage of gas in air at which the odor becomes readily detectable?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
North Shore Gas Safety Inspection Program, item F, Odorization of Gas.		
<b>TAPPING PIPELINES UNDER PRESSURE PROCEDURES</b>		<b>Status</b>
[192.605(a)][192.627]	Does the operator's procedure require that hot taps be made by a qualified crew?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
North Shore Gas OM Exhibit 12 Welding Appendix		



# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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If an item is marked Unsatisfactory, Not Applicable, or Not Checked, an explanation must be included in this report.

PIPELINE PURGING PROCEDURES		Status
[192.605(a)][192.629(a)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing air must be properly purged?	Satisfactory
<b>General Comment:</b> North Shore General Order 2.180, Purging and Gassing - Mains and Services.		
[192.605(a)][192.629(b)]	Do the operator's procedures require that purging of pipelines must be done to prevent entrapment of an explosive mixture in the pipeline lines containing gas must be properly purged?	Satisfactory
<b>General Comment:</b> North Shore General Order 2.180, Purging and Gassing - Mains and Services.		
MAINTENANCE PROCEDURES		Status
[192.605(a)][192.703(b)]	Does the operator's procedure require that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service?	Unsatisfactory
<b>NOA Comment:</b> A procedure could not be located that requires that each segment of pipeline that becomes unsafe must be replaced, repaired, or removed from service.		
[192.605(a)][192.703(c)]	Does the operator's procedure require that hazardous leaks must be repaired promptly?	Satisfactory
<b>General Comment:</b> North Shore Gas General Order 2.020, Procedures for reporting, classifying, rechecking, repairing and clearing of outside natural gas leaks.		
TRANSMISSION LINES - PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
[192.605(b)][192.705(a)]	Does the operator's procedure require patrolling of surface conditions on and adjacent to transmission line right of way for indications of leak, construction activities, and other factors affecting safety and operations?	Satisfactory
<b>General Comment:</b> North Shore Gas OM, Safety Inspection Program.		
[192.605(b)][192.705(b)]	Does the operator's procedure require that the frequency of patrols is to be determined by the size of the line, the operating pressures, the class location, terrain, weather, and other relevant factors, but intervals between patrols may not be longer than prescribed in .705(b)?	Satisfactory
<b>General Comment:</b> North Shore Gas OM, Safety Inspection Program		

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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[192.605(b)][192.706]	Does the operator's procedure require leakage surveys at a minimum of 1 year/15 months	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas OM, Safety Inspection Program		
[192.605(b)][192.706(a)]	Does the operator's procedure include leak detector equipment survey requirements for transmission lines transporting un-odorized gas in Class 3 locations 7½ months but at least twice each calendar year?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas OM, Safety Inspection Program		
[192.605(b)][192.706(b)]	Does the operator's procedure include leak detector equipment survey requirements for lines transporting un-odorized gas in Class 4 locations - 4½ months but at least 4 times each calendar year?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas OM, Safety Inspection Program		
DISTRIBUTION SYSTEM PATROLLING & LEAKAGE SURVEY PROCEDURES		Status
[192.605(b)][192.721(a)]	Does the operator's procedure require the frequency of patrolling mains to be determined by the severity of the conditions which could cause failure or leakage?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas OM, Safety Inspection Program		
[192.605(b)][192.721(b)(1)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled in business districts at intervals not exceeding 4½ months, but at least four times each calendar year? and	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, Corrosion Control Order 2.200, Bridge, Vault, and Above Ground Station Piping Inspections.		
[192.605(b)][192.721(b)(2)]	Does the operator's procedure require that mains in places or on structures where anticipated physical movement or external loading could cause failure or leakage must be patrolled outside business districts at intervals not exceeding 7½ months, but at least twice each calendar year?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, Corrosion Control Order 2.200, Bridge, Vault, and Above Ground Station Piping Inspections.		
[192.605(b)][192.723(b)(1)]	Does the operator's procedure require periodic leak	<b>Satisfactory</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment in business districts as specified, 1/yr (15 months)?	
<b>General Comment:</b> <i>North Shore Gas OM, Safety Inspection Program</i>		
[192.605(b)][192.723(b)(2)]	Does the operator's procedure require periodic leak surveys determined by the nature of the operations and conditions, and be performed with leak detector equipment outside of business districts as specified, once every 5 calendar years/63 mos.; for unprotected lines subject to .465(e) where electrical surveys are impractical, once every 3 years/39 mos.	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas OM, Safety Inspection Program</i>		
<b>LINE MARKER PROCEDURES</b>		<b>Status</b>
[192.605(b)][192.707]	Does the operator's procedure require that line markers be installed and labeled as required?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas General Order 2.100, Pipeline Markers, Buried Transmission Lines.</i>		
<b>TRANSMISSION RECORD KEEPING PROCEDURES</b>		<b>Status</b>
<b>Category Comment:</b> <i>This was not checked as part of this audit. This will be completed at a later date as part of the Transmission O&amp;M review.</i>		
[192.605(b)][192.709(a)]	Does the operator's procedure require that records must be maintained on repairs to the pipe for the life of the system?	<b>Not Checked</b>
[192.605(b)][192.709(b)]	Does the operator's procedure require that records must be maintained on repairs to "other than pipe" for 5 years?	<b>Not Checked</b>
[192.605(b)][192.709(c)]	Does the operator's procedure require that records must be maintained for Operation (Sub L) and Maintenance (Sub M) patrols, surveys, tests for 5 years or until next completion of the next inspection cycle?	<b>Not Checked</b>
<b>TRANSMISSION FIELD REPAIR PROCEDURES</b>		<b>Status</b>
<b>Category Comment:</b> <i>This was not checked as part of this audit. This will be completed at a later date as part of the Transmission O&amp;M review.</i>		
[192.605(b)][192.713(a)(1)]	Does the operator's procedure require that each	<b>Not Checked</b>

## OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	imperfection or damage that impairs the serviceability of pipe in a steel transmission line operating at or above 40 percent of SMYS must be removed by cutting out and replacing a cylindrical piece of pipe; OR must be repaired by a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	
[192.605(b)][192.713(b)]	Does the operator's procedure require that the operating pressure must be at a safe level during repair operations?	<b>Not Checked</b>
[192.605(b)][192.715(a)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 if the segment of transmission line is taken out of service?	<b>Not Checked</b>
[192.605(b)][192.715(b)(1)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the weld is not leaking?	<b>Not Checked</b>
[192.605(b)][192.715(b)(2)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the pressure is reduced to produce a stress that is 20% of SMYS?	<b>Not Checked</b>
[192.605(b)][192.715(b)(3)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) must be repaired in accordance with the applicable requirements of §192.245 while the segment of transmission line is in service if the grinding is limited so that 1/8 inch thickness of pipe weld remains?	<b>Not Checked</b>
[192.605(b)][192.715(c)]	Does the operator's procedure require that each weld that is unacceptable under §192.241(c) and cannot be repaired in accordance with .715(a) or .715(b) then a full encirclement welded split sleeve of appropriate design must be installed?	<b>Not Checked</b>
[192.605(b)][192.717(a)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by removing the leak by cutting out and replacing a cylindrical piece of pipe? OR	<b>Not Checked</b>

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[192.605(b)][192.717(b)(1)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a full encirclement welded split sleeve of appropriate design, unless the transmission line is joined by mechanical couplings and operates at less than 40 percent of SMYS? OR	<b>Not Checked</b>
[192.605(b)][192.717(b)(2)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made by installing a properly designed bolt-on-leak clamp if the leak is due to a corrosion pit? OR	<b>Not Checked</b>
[192.605(b)][192.717(b)(3)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is due to a corrosion pit and on pipe of not more than 40,000 psi (267 Mpa) SMYS, fillet weld over the pitted area a steel plate patch with rounded corners, of the same or greater thickness than the pipe, and not more than one-half of the diameter of the pipe in size? OR	<b>Not Checked</b>
[192.605(b)][192.717(b)(4)]	Do the operator's procedures require that each permanent field repair of a leak on a transmission line must be made if the leak is on a submerged pipeline in inland navigable waters, mechanically apply a full encirclement split sleeve of appropriate design? OR	<b>Not Checked</b>
[192.605(b)][192.717(b)(5)]	Does the operator's procedure require that each permanent field repair of a leak on a transmission line must be made by applying a method that reliable engineering tests and analyses show can permanently restore the serviceability of the pipe?	<b>Not Checked</b>
[192.605(b)][192.719(a)]	Does the operator's procedure require that replacement pipe must be pressure tested to meet the requirements of a new pipeline?	<b>Not Checked</b>
[192.605(b)][192.719(b)]	Does the operator's procedure require that for lines of 6-inch diameter or larger and that operate at 20% of more of SMYS, the repair must be nondestructively tested in accordance with §192.241(c)?	<b>Not Checked</b>
<b>TEST REQUIREMENTS FOR REINSTATING SERVICE LINES</b>		<b>Status</b>
[192.605(b)][192.725(a)]	Does the operator's procedure require that disconnected service lines must be tested the same	<b>Satisfactory</b>

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	as a new service line?	
<b><u>General Comment:</u></b> <i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.</i>		
[192.605(b)][192.725(b)]	Does the operator's procedure require that service lines that are temporarily disconnected must be tested from the point of disconnection, the same as a new service line, before reconnect?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas General Order 2.170, Procedure for pressure testing mains and service pipes.</i>		
<b>ABANDONMENT or DEACTIVATION of FACILITIES PROCEDURES</b>		<b>Status</b>
[192.605(b)][192.727(b)]	Does the operator's procedure require disconnecting both ends, purge, and seal each end before abandonment or a period of deactivation where the pipeline is not being maintained?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Main Work Order 1.130, Procedure for permanent retirement/abandonment of main. Service Pipe Work Order 1.900, Service cut-offs.</i>		
[192.605(b)][192.727(c)]	Does the operator's procedure require that, except for service lines, each inactive pipeline that is not being maintained under Part 192 must be disconnected from all gas sources/supplies, purged, and sealed at each end?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Main Work Order 1.130, Procedure for permanent retirement/abandonment of main</i>		
[192.605(b)][192.727(d)(1)]	Does the operator's procedure require that whenever service to a customer is discontinued the valve that is closed to prevent the flow of gas to the customer must be provided with a locking device or other means designed to prevent the opening of the valve by persons other than those authorized by the operator? OR	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Service Pipe Work Order 1.900, Service Cut-offs</i>		
[192.605(b)][192.727(d)(2)]	Does the operator's procedure require that whenever service to a customer is discontinued a mechanical device or fitting that will prevent the flow of gas must be installed in the service line or in the meter assembly? OR	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas, Field Service Department, Section 3, Meter turn on and turn off procedures.</i>		
[192.605(b)][192.727(d)(3)]	Does the operator's procedure require that whenever	<b>Satisfactory</b>

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	service to a customer is discontinued the customer's piping must be physically disconnected from the gas supply and the open pipe ends sealed?	
<b><u>General Comment:</u></b>		
<i>North Shore Gas Service Pipe Work Order 1.900, Service Cut-offs</i>		
[192.605(b)][192.727(e)]	Does the operator's procedure require that if air is used for purging, the operator shall ensure that a combustible mixture is not present after purging?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		
<i>North Shore Gas Main Work Order 1.130, Procedure for permanent retirement/abandonment of main.</i>		
[192.605(b)][192.727(g)]	Does the operator's procedure require that the operator must file reports upon abandoning underwater facilities crossing commercially navigable waterways, including offshore facilities?	<b>Not Applicable</b>
<b><u>General Comment:</u></b>		
<i>The operator does not have any commercially navigable waterways.</i>		
COMPRESSOR STATION PROCEDURES		Status
<b><u>Category Comment:</u></b>		
<i>This was not included as part of the audit. This will be reviewed as part of the Transmission audit at a later date.</i>		
[192.605(b)(7)][192.605(b)(6)]	Does the operator's procedure include provisions for isolating units or sections of pipe and for purging before returning to service?	<b>Not Checked</b>
[192.605(b)(7)][192.605(b)(7)]	Does the operator's procedure require starting, operating, and shutdown procedures for gas compressor units?	<b>Not Checked</b>
[192.605(b)(7)][192.731]	Does the operator's procedure require inspection and testing for remote control shutdowns and pressure relieving devices at a minimum of 1 per yr/15 months), prompt repair or replacement?	<b>Not Checked</b>
[192.605(b)(7)][192.735(a)]	Does the operator's procedure require storage of excess flammable or combustible materials at a safe distance from the compressor buildings?	<b>Not Checked</b>
[192.605(b)(7)][192.735(b)]	Does the operator's procedure require above ground storage tanks to be protected according to NFPA #30; Amdt 192-103 pub. 06/09/06 eff. 07/10/06?	<b>Not Checked</b>
[192.605(b)(7)][192.736(a)(1)]	Does the operator's procedure require that compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: 50% of the upright side areas are permanently open? OR	<b>Not Checked</b>

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[192.605(b)(7)][192.736(a)(2)]	Does the operator's procedure require compressor buildings in a compressor station must have fixed gas detection and alarm systems (must be performance tested), unless: It is an unattended field compressor station of 1000 hp or less?	Not Checked
<b>PRESSURE LIMITING and REGULATING STATION PROCEDURES</b>		<b>Status</b>
[192.605(b)][192.739(a)(1)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is in good mechanical condition?	Satisfactory
<b>General Comment:</b> North Shore Gas Safety Inspection Plan, Section D, Regulator Station.		
[192.605(b)][192.739(a)(2)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is adequate from the standpoint of capacity and reliability of operation for the service in which it is employed	Satisfactory
<b>General Comment:</b> North Shore Gas Safety Inspection Plan, Section D, Regulator Station.		
[192.605(b)][192.739(a)(3)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is set to control or relieve at correct pressures consistent with .201(a), except for .739(b).	Satisfactory
<b>General Comment:</b> North Shore Gas Safety Inspection Plan, Section D, Regulator Station.		
[192.605(b)][192.739(a)(4)]	Does the operator's procedure require inspection and testing for pressure limiting stations, relief devices, pressure regulating stations and equipment at a minimum of 1 per yr/15 months to determine if the equipment is properly installed and protected from dirt, liquids, and other conditions that may prevent proper operation.	Satisfactory
<b>General Comment:</b> North Shore Gas Safety Inspection Plan, Section D, Regulator Station.		
[192.605(b)][192.739(b)]	Does the operator's procedure require steel pipelines whose MAOP is determined under §192.619(c), if the MAOP is 60 psi (414 kPa) gauge or more, the control or relief pressure limit is as required by .739 (b).	Satisfactory



# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<b><u>General Comment:</u></b> North Shore Gas Exhibit 1, General, Distribution mains, service pipes, and regulators.		
[192.605(b)][192.741(a)]	Does the operator's procedure require telemetering or recording pressure gauges to be in place to indicate gas pressure in the district that is supplied by more than one regulating station?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> Documentation could not be provided that requires the telemetering or recording gauges to be in place to indicate gas pressure in the district that supplies more than one regulating station.		
[192.605(b)][192.741(b)]	Does the operator's procedure require the operator to determine the need in a distribution system supplied by only one district station?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> Documentation could not be located of a procedure that requires the operator to determine the need in a distribution system supplied by only one district station.		
[192.605(b)][192.741(c)]	Does the operator's procedure require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> Documentation could not be provided for a procedure to require the operator to inspect equipment and take corrective measures when there are indications of abnormally high or low pressure.		
[192.605(b)][192.743(a)]	Does the operator's procedure require that capacity must be consistent with .201(a) except for .739(b), and be determined at a minimum of 1 per yr/15 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> North Shore uses a regulator monitor configuration.		
[192.605(b)][192.743(b)]	If the capacities are calculated, Does the operator's procedure require them to be compared with the rated or experimentally determined relieving capacity of the device for the conditions under which it operates?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> North Shore uses a regulator monitor configuration.		
[192.605(b)][192.743(c)]	Does the operator's procedure require new or additional devices be installed to provide required capacity if insufficient capacity exists?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> North Shore uses a regulator monitor configuration.		
<b>VALVE AND VAULT MAINTENANCE PROCEDURES</b>		<b>Status</b>

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[192.605(b)][192.745(a)]	Does the operator's procedure require that each transmission valve that might be required during an emergency is inspected and partially operated at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas Safety Inspection Plan, Section B, Line Valves		
[192.605(b)][192.745(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any transmission valve found inoperable, unless the operator designates an alternative valve?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas Safety Inspection Plan, Section B, Line Valves		
[192.605(b)][192.747(a)]	Does the operator's procedure require that each distribution valve that might be required during an emergency is checked and serviced at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas Safety Inspection Plan, Emergency Operating Valves.		
[192.605(b)][192.747(b)]	Does the operator's procedure require that prompt remedial action will be taken to correct any valve found inoperable, unless the operator designates an alternative valve?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas Safety Inspection Plan, Emergency Operating Valves.		
[192.605(b)][192.749]	Does the operator's procedure require that vaults greater than 200 cubic feet must be inspected at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas Safety Inspection Plan, Vault Maintenance		
PREVENTION of ACCIDENTAL IGNITION PROCEDURES		Status
[192.605(b)][192.751(a)]	Does the operator's procedure require that when a hazardous amount of gas is being vented into open air, each potential source of ignition must be removed from the area and a fire extinguisher must be provided?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> North Shore Gas, Section 2.00, Safety Rules.		
[192.605(b)][192.751(b)]	Does the operator's procedure prohibit gas or electric welding or cutting on pipe or on pipe components	<b>Satisfactory</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	that contain a combustible mixture of gas and air in the area of work?	
<b>General Comment:</b> <i>North Shore Gas, Exhibit 12, Welding Section 500, Safety.</i>		
[192.605(b)][192.751(c)]	Does the operator's procedure require that warning signs will be posted, where appropriate?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas General Order 2.210, Excavation and Trenching Requirements.</i>		
<b>CAULKED BELL AND SPIGOT JOINTS PROCEDURES</b>		<b>Status</b>
<b>Category Comment:</b> <i>The operator does not have cast iron pipe in their system.</i>		
[192.605(b)][192.753(a)]	Does the operator's procedure require that each cast iron caulked bell and spigot joint that is subject to pressures of more than 25 psi gage must be sealed with mechanical clamp, or sealed with material/device which does not reduce flexibility, permanently bonds, and seals and bonds as prescribed in §192.753(a)(2)(iii)?	<b>Not Applicable</b>
[192.605(b)][192.753(b)]	Does the operator's procedure require that when cast iron bell and spigot subject to 25 psig or less, joints, when exposed for any reason, must be sealed by means other than caulking?	<b>Not Applicable</b>
<b>PROTECTING CAST-IRON PIPELINE PROCEDURES</b>		<b>Status</b>
<b>Category Comment:</b> <i>The operator does not have cast iron pipe in their system.</i>		
[192.605(b)][192.755(a)(1)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from vibrations from heavy construction equipment, trains, trucks, buses or blasting?	<b>Not Applicable</b>
[192.605(b)][192.755(a)(2)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from impact forces by vehicles?	<b>Not Applicable</b>
[192.605(b)][192.755(a)(3)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from earth movement?	<b>Not Applicable</b>

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[192.605(b)][192.755(a)(4)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from apparent future excavations near the pipeline?	Not Applicable
[192.605(b)][192.755(a)(5)]	Does the operator's procedure require that when the operator has knowledge that the support for a segment of a buried cast-iron pipeline is disturbed must provide protection from other foreseeable outside forces which might subject the segment of pipeline to a bending stress?	Not Applicable
[192.605(b)][192.755(b)]	Does the operator's procedure require the operator to as soon as feasible; provide permanent protection for the disturbed segment from external loads?	Not Applicable
<b>WELDING AND WELD DEFECT REPAIR/REMOVAL PROCEDURES</b>		<b>Status</b>
[192.13(c)][192.225(a)]	Does the operator's procedure require their welding procedures to be qualified under Section 5 of API 1104 or Section IX of ASME Boiler and Pressure Code by destructive test?	Satisfactory
<b>General Comment:</b> North Shore Gas, Welding Section 1.		
[192.13(c)][192.225(b)]	Does the operator's procedure require each welding procedure to be recorded in detail, including the results of the qualifying tests?	Satisfactory
<b>General Comment:</b> North Shore Gas Welding Section 203, Qualification of Welding Procedures.		
[192.13(c)][192.227(a)]	Does the operator's procedure require their welders be qualified Section 6 of API 1104 or Section IX of ASME Boiler and Pressure Code?	Satisfactory
<b>General Comment:</b> North Shore Gas, Welding Section 1		
[192.13(c)][192.227(b)]	Does the operator's procedure require their welders be qualified under Section I of Appendix C to weld on lines that operate at <20% SMYS?	Satisfactory
<b>General Comment:</b> North Shore Gas Welding Section 205, Qualification of Welders.		
[192.13(c)][192.229(a)]	Does the operator's procedure require a welder to successfully complete a destructive test to weld on compressor station piping and components?	Satisfactory
<b>General Comment:</b>		

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<i>North Shore Gas Welding Manual, section 205.2.2, Multiple Qualifications.</i>		
[192.13(c)][192.229(b)]	Does the operator's procedure require no welder may weld with a particular welding process unless, within the preceding 6 months, he has engaged in welding with that process?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Welding Section 209, Disqualification of Welders</i>		
[192.13(c)][192.229(c)(1)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at > 20% SMYS unless within the preceding 6 calendar months the welder has had one weld tested and found acceptable under the sections 6 or 9 of API Standard 1104?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Welding Section 209, Disqualification of Welders.</i>		
[192.13(c)][192.229(c)(2)]	Does the operator's procedure require a welder qualified under .227(a) may not weld on pipe that operates at < 20% SMYS unless the welder is tested in accordance with .229(c) (1) or requalifies under .229(d) (1) or (d) (2)?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Welding Section 205, Qualification of Welders</i>		
[192.13(c)][192.229(d)(1)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 1 year/15 months? OR	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator re-qualifies a welder not to exceed 7 1/2 months.</i>		
[192.13(c)][192.229(d)(2)]	Does the operator's procedure require that an Appendix C welder be re-qualified within 7 1/2 months but at least twice per calendar year and has met the requirements of .229(d)(i)(ii)?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Welding, Section 206, Re-qualification of welders.</i>		
[192.13(c)][192.231]	Does the operator's procedure require that welding operations must be protected from weather conditions that would impair the quality of the completed weld?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Welding Section 210.5, Weather Conditions</i>		
[192.13(c)][192.233]	Does the operator's procedure require that miter	<b>Satisfactory</b>

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	joints be made in accordance with this section?	
<b><u>General Comment:</u></b> <i>North Shore Gas Welding Manual Appendix, Page 5, Alignment.</i>		
[192.13(c)][192.235]	Does the operator's procedure require proper welding surface preparation and joint alignment?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Welding Section 210.2, Alignment.</i>		
[192.13(c)][192.241(a)(1)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure compliance with the welding procedure?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas, Welding Manual, section 211.3, Qualification of Inspection Personnel</i>		
[192.13(c)][192.241(a)(2)]	Does the operator's procedure require that visual inspection must be conducted by an individual qualified by appropriate training and experience to ensure that the weld is acceptable in accordance with Section 9 of API 1104?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas, Welding Manual, section 211.3, Qualification of Inspection Personnel</i>		
[192.13(c)][192.241(b)(1)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except welds that are visually inspected and approved by a qualified welding inspector if the nominal pipe diameter is less than 6 inches? OR	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Welding Manual, section 205.2.2, Multiple Qualifications.</i>		
[192.13(c)][192.241(b)(2)]	Does the operator's procedure require that welds on pipelines to be operated at 20% or more of SMYS must be nondestructively tested in accordance with 192.243, except a pipeline that is to operate at a pressure that produces a hoop stress of less than 40% of SMYS and the welds are so limited in number that nondestructive testing is impractical?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Welding Manual, section 205.2.2, Multiple Qualifications.</i>		
[192.13(c)][192.241(c)]	Does the operator's procedure require that the acceptability of a weld, which is based on	<b>Satisfactory</b>

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	nondestructively tested or visually inspected, is determined according to the standards in Section 9 of API Standard 1104?	
<b>General Comment:</b> <i>North Shore Gas Welding Manual, section 206.1.1,1 Radiography - Butt Welds.</i>		
[192.13(c)][192.245(a)]	Does the operator's procedure require that each weld that is unacceptable must be removed or repaired?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas Welding Manual, section 212, repair and removal of defects.</i>		
[192.13(c)][192.245(b)]	Does the operator's procedure require that each weld that is repaired must have the defect removed down to sound metal, and the segment to be repaired must be preheated if conditions exist which would adversely affect the quality of the weld repair?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas Welding Manual, section 212, repair and removal of defects.</i>		
[192.13(c)][192.245(c)]	Does the operator's procedure require that repair of a crack or any other defect in a previously repaired area must be in accordance with a written weld repair procedure qualified under §192.225?	<b>Satisfactory</b>
<b>General Comment:</b> <i>North Shore Gas Welding Manual, section 212, repair and removal of defects.</i>		
Discuss with the operator regarding the use of a low hydrogen process when welding a sleeve for repair.		<b>Yes</b>
<b>TRANSMISSION NONDESTRUCTIVE TESTING PROCEDURES</b>		<b>Status</b>
<b>Category Comment:</b> <i>This will be covered at a later date during the Transmission O&amp;M review.</i>		
[192.13(c)][192.243(a)]	Does the operator's procedure require that nondestructive testing of welds must be performed by any process, other than trepanning, that clearly indicates defects that may affect the integrity of the weld?	<b>Not Checked</b>
[192.13(c)][192.243(b)(1)]	Does the operator's procedure require that nondestructive testing of welds must be performed in accordance with written procedures?	<b>Not Checked</b>
[192.13(c)][192.243(b)(2)]	Does the operator's procedure require that nondestructive testing of welds must be performed by persons who have been trained and qualified in the established procedures and with the equipment employed in testing?	<b>Not Checked</b>
[192.13(c)][192.243(c)]	Does the operator's procedure require that	<b>Not Checked</b>

## OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	procedures must be established for the proper interpretation of each nondestructive test of a weld to ensure the acceptability of the weld under §192.241(c)?	
[192.13(c)][192.243(d)(1)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference In Class 1 locations at least 10 percent?	<b>Not Checked</b>
[192.13(c)][192.243(d)(2)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 2 locations at least 15 percent?	<b>Not Checked</b>
[192.13(c)][192.243(d)(3)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference in Class 3 and Class 4 locations, at crossings of major or navigable rivers, offshore, and within railroad or public highway rights-of-way, including tunnels, bridges, and overhead road crossings, 100% unless impracticable, then 90%?	<b>Not Checked</b>
[192.13(c)][192.243(d)(4)]	When nondestructive testing is required under §192.241(b), does the operator's procedure require that the following percentages of each day's field butt welds, selected at random by the operator, must be nondestructively tested over their entire circumference at pipeline tie-ins, 100 %?	<b>Not Checked</b>
[192.13(c)][192.243(e)]	Does the operator's procedure require that a sample of each welder's work for each day must be nondestructively tested, when nondestructive testing is required under §192.241(b), except for a welder whose work is isolated from the principal welding activity?	<b>Not Checked</b>
[192.13(c)][192.243(f)]	Does the operator's procedure require that the operator must retain, for the life of the pipeline, a record showing by mile post, engineering station, or by geographic feature, the number of welds nondestructively tested, the number of welds rejected, and the disposition of the rejected welds?	<b>Not Checked</b>
<b>JOINING of PIPELINE MATERIALS OTHER THAN BY WELDING PROCEDURES</b>		<b>Status</b>



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[192.273(b)][192.283(b)]	Does the operator have qualified joining procedures for mechanical joints?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Plastic Pipe Joining Order 5.400, Electrofusion coupling procedure. Plastic Pipe Joining Order 5.450, Electrofusion tee installation procedure.</i>		
[192.281(a)][192.281(a)]	Does the operator's procedure prohibit joining plastic pipe by threaded or miter joint?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>The procedures are located in the O-M 520: Section 520.4.2 Page 6 and Service Pipe Work Order 1.000 Page 1</i>		
[192.273(b)][192.283(a)]	Does the operator have qualified joining procedures for heat fusion, solvent cement, and adhesive joints?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Peoples Gas Plastic Pipe Joining Orders 5.050 thru 5.450</i>		
[192.273(b)][192.283(c)]	Does the operator's procedure require that persons making and inspecting joints must have available a copy of the qualified joining procedure?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Plastic Pipe Joining Order 5.000, Qualification and inspection requirements for butt and sidewall fusion. Item 3, General.</i>		
[192.273(b)][192.285(a)]	Does the operator's procedure require that person making joints with plastic pipe must be qualified?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Peoples Gas Plastic Pipe Joining Order 5.000, Qualification and inspection requirements.</i>		
[192.273(b)][192.285(b)(1)]	Does the operator's procedure require the specimen joint to be visually examined during and after assembly or joining?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Reviewed the joining procedures. Based on the type of joining performed, a visual inspection is required.</i>		
[192.273(b)][192.285(b)(2)]	Does the operator have procedures requiring when a specimen joint used for personnel qualification in the case of a heat fusion, solvent cement, or adhesive joint be tested under any one of the qualified test methods?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>Peoples Gas Plastic Pipe Joining Order 5.000, Qualification and inspection requirements.</i>		
[192.273(b)][192.285(c)]	Does the operator have procedures that require a person to be requalified if during any 12 month period that person does not make any joints or has 3 joints or 3% of joints, whichever is greater, found to be unacceptable?	<b>Satisfactory</b>

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<b><u>General Comment:</u></b> Peoples Gas Plastic Pipe Joining Order 5.000, Qualification and inspection requirements.		
[192.273(b)][192.285(d)]	Does the operator have a method to determine that each person making joints on plastic pipelines is qualified?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> Peoples Gas Plastic Pipe Joining Order 5.000, Qualification and inspection requirements.		
[192.273(b)][192.287]	Does the operator's procedure require that person inspecting plastic pipe joints must be qualified by appropriate training or experience to evaluate plastic pipe joints?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> Peoples Gas Plastic Pipe Joining Order 5.000, Qualification and inspection requirements.		
<b>CORROSION CONTROL PROCEDURES</b>		<b>Status</b>
[192.605(b)][192.453]	Does the operator's procedure require that corrosion control procedures required by .605(b)(2), including those for the design, installation, operation, and maintenance of cathodic protection systems, must be carried out by, or under the direction of, a person qualified in pipeline corrosion control methods?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> Documentation could not be provided that requires the operator's procedure including design, installation, operation and maintenance of cathodic protection systems must be carried out by, or under the direction of a person qualified in pipeline corrosion control methods.		
[192.605(b)][192.455(a)]	Does the operator's procedure require that pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after completion of construction? (see exceptions in code)	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> Staff could not identify in the operator's procedure that requires pipelines installed after July 31, 1971, buried segments must be externally coated and cathodically protected within one year after the completion of construction.		
[192.605(b)][192.455(e)]	Does the operator's procedure require that aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8, unless tests or experience indicate its suitability in the particular environment involved?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> Staff could not identify in the operator's procedure where aluminum may not be installed in a buried or submerged pipeline if that aluminum is exposed to an environment with a natural pH in excess of 8.		
[192.605(b)][192.457(a)]	Does the operator's procedure require that all	<b>Unsatisfactory</b>

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	effectively coated steel transmission pipelines installed prior to August 1, 1971, must be cathodically protected?	
<b><u>NOA Comment:</u></b> <i>Documentation could not be provided that requires coated steel transmission pipe installed prior to August 1, 1971, must be cathodically protected</i>		
[192.605(b)][192.457(b)]	Does the operator's procedure require that cathodic protection must be provided in areas of active corrosion for bare or ineffectively coated transmission lines, and bare or coated compressor station piping, regulator station, meter station piping, and (except for cast iron or ductile iron) bare or coated distribution lines installed before August 1, 1971?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator does not have any bare or unprotected mains or services in their territory.</i>		
[192.605(b)][192.479(b)]	Does the operator's procedure require coating material to be suitable for the prevention of atmospheric corrosion?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 1.100, Coating for buried or exposed pipe and fittings.</i>		
[192.605(b)][192.459]	Does the operator's procedure require that whenever an operator has knowledge that any portion of a buried pipeline is exposed, the exposed portion must be examined for evidence of external corrosion if the pipe is bare, or if the coating is deteriorated and remedial actions taken when required?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 1.900, Inspecting Steel Pipe when Exposed.</i>		
[192.605(b)][192.461(a),192.461(b)]	Does the operator's procedure address the external protective coating requirements of the regulations?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 1.900, Inspecting Steel Pipe when Exposed</i>		
[192.605(b)][192.463]	Does the operator's procedure require cathodic protection levels that comply with one or more applicable criteria contained in Appendix D?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 1.800, Measurement procedure for corrossions inspection</i>		
[192.605(b)][192.465(a)]	Does the operator's procedure require pipe-to-soil monitoring at a minimum of 1 per year/15 months and for separately protected short sections of main and transmission main or separately protected	<b>Satisfactory</b>

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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	service lines require monitoring of 10% of the system to be surveyed annually?	
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, External Corrosion Control, page 5</i>		
[192.605(b)][192.465(b)]	Does the operator's procedure require rectifier monitoring be conducted at a minimum of 6 per year/2 1/2 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, External Corrosion Control, page 6</i>		
[192.605(b)][192.465(c)]	Does the operator's procedure require critical interference bond monitoring be conducted at a minimum of 6 per year/2 1/2 months and non-critical bond monitoring be conducted at a minimum of 1 per year/15 months?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, External Corrosion Control, page 6</i>		
[192.605(b)][192.465(d)]	Does the operator's procedure require that prompt remedial action to correct any deficiencies indicated by the monitoring?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, Remedial action, pages 4-5</i>		
[192.605(b)][192.465(e)]	Does the operator's procedure require electrical surveys on bare and unprotected lines at a minimum of once per 3 years/39 months and must cathodically protect active corrosion areas, if found?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Safety Inspection Program, Leakage Surveys.</i>		
[192.605(b)][192.467(a)]	Does the operator's procedure require that each buried or submerged pipeline be electrically isolated from other underground metallic structures, unless interconnected?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 2.000, Cathodic Protection Insulation.</i>		
[192.605(b)][192.467(b)]	Does the operator's procedure require that one or more insulating devices must be installed where electrical isolation of a portion of a pipeline is necessary to facilitate the application of corrosion control?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		

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<i>North Shore Gas Corrosion Control Order 2.000, Cathodic Protection Insulation.</i>		
[192.605(b)][192.467(c)]	Does the operator's procedure require that each pipeline must be electrically isolated from metallic casings that are a part of the underground system?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 2.600, Corrosion inspection procedure for carrier/casing test points.</i>		
[192.605(b)][192.467(d)]	Does the operator's procedure require that inspection and electrical tests must be made to assure that electrical isolation is adequate?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 2.600, Corrosion inspection procedure for carrier/casing test points</i>		
[192.605(b)][192.469]	Does the operator's procedure define how a sufficient number of test stations or contact points for electrical measurement are established to determine the adequacy of cathodic protection?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 1.300, Test station and magnesium anode installation for cathodic protection of buried steel pipe.</i>		
[192.605(b)][192.471]	Does the operator's procedure define how test leads will be installed and maintained?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 1.300, Test station and magnesium anode installation for cathodic protection of buried steel pipe</i>		
[192.605(b)][192.473(a)]	Does the operator's procedure require the determination of how interference currents are affecting the cathodic protection system?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator has not experienced any interference currents on their system.</i>		
[192.605(b)][192.473(b)]	Does the operator's procedure require the determination that impressed current type cathodic protection system or galvanic anode system are designed and installed to minimize any adverse effects on existing adjacent underground metallic structures?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Corrosion Control Order 1.300, Test station and magnesium anode installation for cathodic protection of buried steel pipe</i>		
[192.605(b)][192.475(a)]	Does the operator's procedure require that if corrosive gas is transported by pipeline, the corrosive effect of the gas on the pipeline must be investigated and steps taken to minimize internal corrosion?	<b>Not Applicable</b>
<b><u>General Comment:</u></b>		

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<i>The operator does not transport corrosive gas.</i>		
[192.605(b)][192.475(b)]	Does the operator's procedure require that whenever any pipe is removed from a pipeline for any reason, the internal surface must be inspected for evidence of corrosion?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, Internal Corrosion Control, page 6</i>		
[192.605(b)][192.475(b)(1)]	Does the operator's procedure require that when internal corrosion is observed that the adjacent pipe will be inspected for internal corrosion?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, Internal Corrosion Control, page 6</i>		
[192.605(b)][192.475(b)(2)]	Does the operator's procedure require replacement of pipe when internal corrosion is observed to the extent required by the applicable paragraphs of §§192.485, 192.487, or 192.489?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, Internal Corrosion Control, page 6</i>		
[192.605(b)][192.475(b)(3)]	Does the operator's procedure require the steps that must be taken when internal corrosion is discovered?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> <i>Staff could not identify in the operator's procedure the steps that must be taken when internal corrosion is discovered.</i>		
[192.605(b)][192.476(a)]	Does the operator's procedure require features incorporated into its design and construction of transmission lines installed after May 23, 2007, to reduce internal corrosion?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator does not transport corrosive gas</i>		
[192.605(b)][192.477]	Does the operator's procedure require, if corrosive gas is being transported, the use of internal corrosion control coupons, or other suitable means of monitoring at a minimum of 2 per year/7 1/2 months?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator does not transport corrosive gas</i>		
[192.605(b)][192.479(a)]	Does the operator's procedure require each exposed pipe, including soil-to-air interface, to be cleaned and coated?	<b>Satisfactory</b>
<b><u>General Comment:</u></b>		

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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North Shore Gas Exhibit 7, Corrosion Control Policy, Internal Corrosion Control, page 6

[192.605(b)][192.481(a)]	Does the operator's procedure require atmospheric corrosion control monitoring at a minimum of 1 per 3 years/39 months?	<b>Satisfactory</b>
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**General Comment:**

North Shore Gas Exhibit 7, Corrosion Control Policy, Internal Corrosion Control, page 7

[192.605(b)][192.481(b)]	Does the operator's procedure require particular attention to atmospheric corrosion on exposed pipe at soil-to-air interfaces, under thermal insulation, under disbonded coatings, at pipe supports, in splash zones, at deck penetrations, and in spans over water?	<b>Satisfactory</b>
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**General Comment:**

North Shore Leak Manual, Page 25, Exposed Pipe Survey

[192.605(b)][192.481(c)]	Does the operator's procedure require protection be provided if atmospheric corrosion is discovered?	<b>Satisfactory</b>
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**General Comment:**

North Shore Gas Exhibit 7, Corrosion Control Policy, Remedial actions.

[192.605(b)][192.483]	Does the operator's procedure require that replacement pipe be coated and cathodically protected?	<b>Satisfactory</b>
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**General Comment:**

North Shore Gas Corrosion Control Order 1.100, Coating material for buried or exposed pipe and fittings.

[192.605(b)][192.485(a)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if general corrosion has reduced the wall thickness?	<b>Satisfactory</b>
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**General Comment:**

Integritys Integrity Management, section 11.2, Remediation of conditions found.

[192.605(b)][192.485(b)]	Does the operator have procedures to replace or repair transmission pipe, or reduce the operating pressure if localized corrosion has reduced the wall thickness?	<b>Satisfactory</b>
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**General Comment:**

Integritys Integrity Management, section 11.2, Remediation of conditions found.

[192.605(b)][192.485(c)]	Does the operator's procedure require the use of Rstreng or B-31G to determine the remaining wall strength?	<b>Satisfactory</b>
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**General Comment:**

# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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<i>Integrus Integrity Management, section 11.2, Remediation of conditions found.</i>		
[192.605(b)][192.487(a)]	Does the operator have procedures to replace or repair distribution pipe if general corrosion has reduced the wall thickness?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> <i>Documentation could not be provided of a procedure to replace or repair distribution pipe if general corrosion has reduced the wall thickness.</i>		
[192.605(b)][192.487(b)]	Does the operator have procedures to replace or repair distribution pipe if localized corrosion has reduced the wall thickness?	<b>Unsatisfactory</b>
<b><u>NOA Comment:</u></b> <i>Documentation could not be provided of a procedure to replace or repair distribution pipe if localized corrosion has reduced the wall thickness.</i>		
[192.605(b)][192.489(a)]	Does the operator have procedures to replace pipe if general graphitization is discovered on cast or ductile iron pipe?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator does not have cast or ductile iron in their system.</i>		
[192.605(b)][192.489(b)]	Does the operator have procedures to repair or replace pipe or seal by internal sealing methods when localized graphitization is discovered on cast or ductile iron pipe?	<b>Not Applicable</b>
<b><u>General Comment:</u></b> <i>The operator does not have cast or ductile iron in their system.</i>		
[192.605(b)][192.491(a)]	Does the operator have procedures requiring the retention of records and maps to show the location of cathodically protected pipe, facilities, anodes, and bonded structures?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, Corrosion Control Records, page 7</i>		
[192.605(b)][192.491(b)]	Does the operator have procedures requiring the retention of records under .491(a) for the life of the pipeline?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, Corrosion Control Records, page 7</i>		
[192.605(b)][192.491(c)]	Does the operator have procedures that require the retention of testing, surveys, or inspections records which detail the adequacy of the corrosion control measures for a minimum of 5 years?	<b>Satisfactory</b>
<b><u>General Comment:</u></b> <i>North Shore Gas Exhibit 7, Corrosion Control Policy, Corrosion Control Records, page 7</i>		



# OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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UPRATING PROCEDURES		Status
<b><u>Category Comment:</u></b>		
<i>The operator does not perform uprates on their system.</i>		
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include pressure raised in increments?	<b>Not Applicable</b>
[192.13(c)][192.553(a)(1)]	Does the operator's procedure include uprating requirements which meet Subpart K and include section checked before further pressure increase?	<b>Not Applicable</b>
[192.13(c)][192.553(a)(2)]	Does the operator's procedure include uprating requirements which meet Subpart K and include hazardous leaks repaired between increments?	<b>Not Applicable</b>
[192.13(c)][192.553(b)]	Does the operator's procedure include uprating requirements which meet Subpart K and include records kept for life of system?	<b>Not Applicable</b>
TRAINING		Status
<b><u>Category Comment:</u></b>		
<i>The training program is included in the O&amp;M, under section 4, Training Procedures, pages 1-27</i>		
[520.10(a)(1)]	Does the operator's procedure contain adequate descriptions of types of training each job classification requires, including those of field foreman, field crew leaders, leak inspectors, new construction inspectors, servicemen and corrosion technicians and/or equivalent classifications?	<b>Satisfactory</b>
[520.10(a)(2)]	Does the operator's procedure include scheduling of verbal instruction and/or on-the-job training for each job classification?	<b>Satisfactory</b>
[520.10(a)(3)]	Does the operator's procedure include provisions for evaluating the performance of personnel to assure their competency in performing the work assigned to them?	<b>Satisfactory</b>
[520.10(a)(4)]	Does the operator's procedure include subject matter relating to recognition of potential hazards, and actions to be taken toward prevention of accidents?	<b>Satisfactory</b>
[520.10(a)(5)]	Are the operator's procedures periodically updated to include new materials, new methods of operation and installation, and changes in general procedures?	<b>Satisfactory</b>
[520.10(a)(6)]	Are the operator's procedures made a part of the gas system's operation, inspection and maintenance plan, and filed with the Commission?	<b>Satisfactory</b>
[520.10(b)]	Does the operator's procedure require that the	<b>Not Applicable</b>

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	operator/personnel (municipal/master meter) attend regularly scheduled instructional courses held by utility companies or participate in courses such as the IGT Gas Distribution Home Study Course, or programs developed and presented by community colleges, vocational schools, universities, consultants or other recognized gas distribution oriented agencies?	
<b><u>General Comment:</u></b>  <i>North Shore Gas is not a municipal operator.</i>		
[520.10(a)]	Does the operator's procedure specify methods to be used for training, including frequency and subject matter of training?	<b>Satisfactory</b>

## OPERATION, MAINTENANCE & CONSTRUCTION PROCEDURE CHECKLIST

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